

\* \* C O N F I D E N T I A L \* \*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER S. FISCHMAN,

Plaintiff,

-against-

Index No. 18-cv-08188

mitsubishi chemical holdings, america, inc.;  
mitsubishi chemical corporation; mitsubishi  
chemical holdings corporation; nicholas oliva, in  
his individual professional capacities; donna  
costa, in her individual and professional  
capacities; and john does 1-10, in their  
individual and professional capacities,

Defendants.

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September 30, 2021  
10:09 a.m.

DEPOSITION of PAT SAUNDERS, a  
Non-Party witness herein, taken by the attorneys  
for the respective parties, pursuant to Notice,  
held via web conference at the above date and  
time before Toni Musacchia, a Stenotype Reporter  
and Notary Public within and for the State of New  
York.

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2 Mr. Oliva?

3 MS. PRIMAVERA: Objection.

4 A. No.

5 Q. Do you know why not?

6 A. No.

7 Q. Do you know whether after she was  
8 transitioned back into the assistant general  
9 counsel role, Ms. Fischman received an exceeds  
10 expectations performance review?

11 A. I'm sorry, when she transitioned back  
12 to?

13 Q. In 2016 --

14 A. Right.

15 Q. -- Ms. Fischman was in the assistant  
16 general counsel role again, right?

17 A. Yes.

18 Q. In that position, did she receive an  
19 exceeds expectations rating for her performance  
20 in 2016?

21 A. I believe she did, yes.

22 Q. Earlier in 2016, are you aware of an  
23 issue concerning the termination of Amber Todd?

24 A. No.

25 Q. Are you familiar with one of the

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2 companies affiliates MKIC?

3 A. Yes.

4 Q. You have some notes concerning  
5 discussions with Yvonne concerning MKIC.

6 MR. BERMAN: You can flip to those, page  
7 2612 towards the end.

8 (Whereupon, a brief recess was taken.)

9 Q. Take a look at this and let me know if  
10 this refreshes your recollection about Amber  
11 Todd.

12 THE WITNESS: Can you scroll up -- down.

13 A. I read it, yes.

14 Q. Does this refresh your recollection as  
15 to whether there was any issue concerning Amber  
16 Todd's departure from the company?

17 A. When you say "any issue," other than  
18 what's written on the page, I don't have any -- I  
19 -- other than what's written on the page, no.

20 Q. Okay. Do you know whether Ms. Todd  
21 requested a severance package for her departure?

22 A. I do not know.

23 Q. Do you know whether her husband had  
24 previously worked for the company, Dan Todd?

25 A. Yes, he did work for the company.